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April 21, 2023

VIA ELECTRONIC FILING

The Honorable Peggy Kuo, Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York

Re: *Bell v. CVS Pharmacy, Inc.*, Case No.: 1:21-cv-06850-PK
Joint Letter Motion re First Amended Complaint and Stay

Dear Judge Kuo:

Plaintiff Monique Bell and Defendant CVS Pharmacy, Inc. jointly seek the following relief. First, Plaintiff requests leave to file the attached First Amended Complaint (“FAC”) pursuant to Federal Rule of Civil Procedure 15(a)(2). CVS, while specifically reserving all rights and defenses thereto, consents to the filing of the FAC, which relates to the parties’ forthcoming proposed class action settlement.

Second, and following the filing of the FAC, the Parties request that this Court stay all non-settlement-related deadlines in this case, including CVS’s deadline to file a responsive pleading to the FAC. The Parties are presently working through the class action settlement agreement and related filings. The request to stay all non-settlement-related deadlines is made in good faith and with no intention of delay, and will allow the Parties to focus their efforts on the class action settlement paperwork, which is due to be filed on April 24, 2023.

We thank the Court for its time and attention.

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARANOFF LLP

BURSOR & FISHER, P.A.

/s/ Laura E. Kogan
Laura E. Kogan

/s/ Joseph I. Marchese
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Counsel for Defendant

Counsel for Plaintiff